

## **C.2 Compliance And Enforcement**



*Timothy L. Bouscaren*  
*Attorney at Law*  
*Suite 900*  
*432 Walnut Street*  
*Cincinnati, Ohio 45202*

(513) 421-3033

May 6, 1992

O: WMD ✓  
CC: O'RIORDAN  
ORC  
RA RF

*File*

*RECEIVED*

MAY 08 1992

**CERTIFIED MAIL**

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

BASF Corporation  
720 Dana Avenue  
Cincinnati, Ohio 45207

*DHD 004236 JIL*

Attention: Lawrence C. Fisher,  
Vice President and General Manager

RE: Notice of Federal Law Violations

Dear Mr. Fisher:

I represent Concerned Evanston Committee ("CEC") and the Network Advocating Legislation Stopping Environmental Toxicity ("NALSET") as well as a large number of individuals who reside in close proximity to the BASF facility located at Montgomery Road and Dana Avenue in Cincinnati, Ohio. On behalf of my clients, I wish to serve notice upon you that both past and present practices at the BASF facility have resulted in violations of the following federal statutes and regulations promulgated thereunder:

- (a) The Comprehensive Environmental Response, Compensation and Liability Act, 43 U.S.C. §9601 et seq. as amended by the Superfund Amendment and Reauthorization Act (SARA) 40 C.F.R. §300 et seq.
- (b) The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, 42, U.S.C. §6901 et seq. (RCRA).

From the information that is available to us, but without limiting the allegations against your facility, both and past and present practices at the BASF facility have caused and threaten to cause the offsite contamination of soil, air and groundwater and the offsite migration of hazardous substances, odors, pollutants, contaminants, dust and leachate.



Lawrence C. Fischer  
May 6, 1992  
Page two

My clients have been directly and adversely affected as a result of having their persons, property and community subjected to recurrent releases of hazardous substances, odors, wind blown fumes and particulate matter. Of particular concern, is the release of hazardous substances, smoke and particulate matters as a direct result of an explosion taking place at the BASF facility on July 19, 1990. On that date at approximately 2:18 p.m., a flammable vapor cloud was released from chemical reactor 6 in the resin plant (building 28) which ignited causing an explosion and fire that damaged most of the BASF facility. Six or seven smaller explosions followed the initial explosion. Houses and other buildings within a three mile radius from the facility were damaged by the explosion. Two BASF employees were killed and ninety (90) workers and residents injured from the explosion, fire and flying glass. According to estimates from BASF officials, the multiple explosions and fire caused an estimated fifty million dollars (\$50,000,000.00) in damages to homes and properties in the Evanston, Norwood, Walnut Hills, Avondale and O'Bryonville communities.

As a direct result of the explosions and fire at the BASF facility on July 19, 1990, a huge smoke flume consisting of numerous ultra hazardous and hazardous chemicals which had been stored and utilized at the facility descended upon the aforementioned communities. Among the toxic and hazardous chemicals released into the environment and onto the persons and properties of my clients and other residents of the aforementioned communities, are those chemicals designated by your facility in a chemical inventory prepared on July 26, 1990 which is attached hereto as exhibit "A". The chemicals released are known to cause deleterious health effects in humans including respiratory problems, diarrhea, skin rashes, reproductive problems and cancer on the day of the explosion. BASF failed to comply with emergency notification requirements contained in 40 C.F.R. §304. BASF has also failed to comply with 40 C.F.R. §311, §312 and §313.

Both prior to and after the explosion at the BASF facility on July 19, 1990, the facility failed to report releases of hazardous substances into the environment which have been documented by the USEPA, the Ohio EPA and the Metropolitan Sewer District. These releases include but are not limited to a release of polyethyelene occurring on December 12, 1985; a release of volatile vapor cloud occurring on February 2, 1986; a release of hydroquinone occurring on June 10, 1987; a release of



Lawrence C. Fischer  
May 6, 1992  
Page three

200 lbs. of toxic chemicals occurring on September 10, 1988; a spill of four gallons of toluene occurring on April 6, 1989; a release of 25 gallons of PX solvent occurring on February 1, 1990; a release of 20 gallons of PX solvent into the Metropolitan Sewer on February 26, 1990; and releases of hazardous substances into the environment on April 3, 1990, July 31, 1990 and August 1, 1990. All of these releases were and are in violation both of the requirements of CERCLA and of the regulations of SARA. Since the explosion on July 19, 1990, the facility has released vast quantities of contaminated soil and sidewalk dust and other hazardous and toxic substances into the air, the groundwater and the metropolitan sewers in violations of CERCLA and SARA. All of the aforementioned practices engaged in by the facility pose a reasonable probability of adverse impact upon the health of my clients and upon the environment.

My clients have incurred and will incur a variety of response costs as a consequence of the facility's actions, including costs necessary to conduct a preliminary assessment of the impact of the site, possible costs of future medical evaluations, possible relocation costs, site monitoring, site clean up and other costs of response. Your facility is liable for these response costs pursuant to 42 U.S.C. §9607 of the CERCLA. The facility's acts and omissions have also given rise to violations of 42 U.S.C. §9603, and §9604. The Cincinnati Metropolitan Sewer District has issued violations notices for the facility's violation of VSO concentrations on numerous occasions including but not limited to May 14, 1990, March 7, 1990, September 26, 1989 and July 4, 1989.

By reason of the foregoing, the facility has also violated standards, regulations, conditions, requirements and prohibitions under RCRA and such conditions have contributed to a situation which may present an eminent and substantial endangerment to the health of the environment. My clients are seeking a thorough independent evaluation of the environmental threat posed presently by the facility and the implementation of response activities necessary to ensure the public, safety, and welfare, and to protect or restore the integrity of the environment. In addition, they are seeking the recovery of costs for medical monitoring and testing both now and in the future, relocation costs and expenses and other equitable relief.

Because the discovery of violations is ongoing, nothing in this notice should be construed as limiting any future claim or notice which may be presented on behalf of my clients or any





Lawrence C. Fischer  
May 6, 1992  
Page four

other persons in the area who have been affected by the violations above noted. All future questions and correspondence regarding this matter should be directed to me.

Yours very truly,



Timothy L. Bouscaren

TLB:ep

cc: Mr. William K. Riley, Administrator  
United States EPA  
401 M. Street S.W.  
Washington, D.C. 20460  
CERTIFIED MAIL

cc: Mr. Valda Adamkus  
Regional Administrator  
United States E.P.A.  
230 South Dearborn Street  
14th Floor  
Chicago, Illinois 60604  
CERTIFIED MAIL

cc: The Honorable George Voinovich  
Office of the Governor  
77 South High Street  
30th Floor  
Columbus, Ohio 43266-0610  
CERTIFIED MAIL

cc: Mr. Donald R. Schregardus  
Director Ohio E.P.A.  
P.O. Box 1049  
361 East Broad Street  
Columbus, Ohio 43215  
CERTIFIED MAIL



Lawrence C. Fischer

May 6, 1992

Page five

cc: Mr. Kenneth Shultz, Manager  
Chemical Emergency Preparedness  
and Prevention Section (CEP&PS)  
& Office of Remedial Response  
P.O. Box 1049  
361 East Broad Street  
Columbus, Ohio 43215  
CERTIFIED MAIL

cc: Robert G. Stachler, Esq.  
Taft, Stettinius & Hollister  
1800 Star Bank Center  
425 Walnut Street  
Cincinnati, Ohio 45202  
CERTIFIED MAIL



Chemical Inventory Prepared 7/26/90  
BASF Dana Avenue Facility - Cincinnati, Ohio

<u>Map</u> <u>Key</u>	<u>Product</u> <u>Code</u>	<u>Chemical</u>	<u>Quantity</u>	<u>Haz</u> <u>Code</u>	<u>Comments</u>
<u>Building 4 East TankRoom</u>					
1.	RU0508	Cymel 243-3	4640 gal.	HFR 220SG	8-1000gal. tanks Square White Tanks
2.			MT		5000 gal. tank
3.	342CC133	Aqua Acrylic Resin		220C	5000 gal. tank
4.	342CC133	Aqua Acrylic Resin	1900 gal.	220C	5000 gal. tank
5.	416CC023	Alkyd Resin	5200 gal.	220C	11300 gal. tank capacity
6.	342CC048	Aqua Grafted Acrylic	5500 gal.	220C	11300 gal. tank capacity
7.			MT		Tank (capacity unknown)
8.	393CC030	Alkyd Resin- Short Non- drying	2717 gal.	230C	8-1000 gal. tank

Ramp Way

9.		Clean MT Drs.			
10.		Raw Mtl.	Partially Full Drums		Numerous possibilities
11.		Raw Mtl./ Product	Part Drums		Numerous possibilities

Key: MT - Empty

<u>Map</u> <u>Key</u>	<u>Product</u> <u>Code</u>	<u>Chemical</u>	<u>Quantity</u>	<u>Haz.</u> <u>Code</u>	<u>Comments</u>
<u>Yard</u>					
12.		Clean MT Drums			
13.		Hazardous Waste Liquid	12 drs.(Max.)		D001, F003, F005
14.		Hazardous Wst. Inter-	12 drs.(Max.) drums		D001, F003, F005 Various items



CONCERNED EVANSTON COMMITTEE

RECEIVED

MAR 11 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V.

March 9, 1992



TO: Pat Willoughby

FROM: Concerned Evanston Committee  
President, E. YisraelSUBJECT: EXCAVATION AND DEMOLITION OF BASF CORPORATION  
INMONT PLANT, DIVISION OF INKS AND COATINGS  
TOXIC WASTE STORAGE FACILITY, 1720 DANA AVENUE  
CINCINNATI, OHIO 45207

Dear Sir,

The Concerned Evanston Committee is officially requesting through this correspondence that the current excavation and demolition of the BASF Corporation Inmont Plant, Division of Inks and Coatings/Toxic Waste Storage Facility located at 1720 Dana Avenue, Cincinnati, Ohio 45207, be STOPPED IMMEDIATELY!

In making this request, we reference you to your letter dated April 6, 1990 to Ms Valerie Thomas, Environmental Coordinator, BASF Corporation, 1720 Dana Avenue, Cincinnati, Ohio 45207, in which you state that they are still in violation of the following regulations: MANAGEMENT OF CONTAINERS, OAC 3745-66-73(A) and ACCUMULATION TIME OF WASTE, ORC 3734.02(F). We are also referencing you to a letter dated August 13, 1990 from David Combs, DSHWM, Re: BASF Inmont, Dana Avenue, Waste Characterization in which was discussed the CLASSIFICATION AND DISPOSITION PLAN FOR THE WASTE TO BE GENERATED FROM THE CLEAN UP ACTIVITIES AT THE DANA AVENUE SITE.

These violations and revisions concern us very much because there is no information available as to the resolution or the disposition of these matters. Particularly as it relates to HAZARDOUS DEBRIS AND SOIL (Bricks, buildings and portions of buildings previously storing hazardous waste).

Therefore we are once again requesting that ALL ACTIVITIES PRESENTLY TAKING PLACE AT THAT FACILITY BE STOPPED IMMEDIATELY!

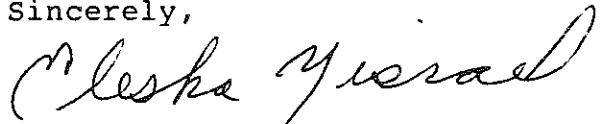




We are also requesting a copy of all reports and correspondence relating to the above mentioned matters (violations and revisions) as well as all files for the past five years concerning BASF Corporations Inmont Plant Division of Inks and Coatings, 1720 Dana Avenue, Cincinnati, Ohio 45207.

Until this information is received and reviewed and the residents are assured that this TOXIC WASTE STORAGE FACILITY is no longer a threat to their unalienable rights of Life, Liberty and the Pursuit of Happiness, we will consider this facility to be a clear and present danger to the residents. and again request that ALL ACTIVITIES BE STOPPED IMMEDIATELY!

Sincerely,



CONCERNED EVANSTON COMMITTEE  
Elisha Yisrael, President  
3156 Syracuse Street  
Cincinnati, Ohio 45206  
(513) 751-2476 (Ask for  
Ed Currie - Research)

dad; cc:

cc: David Combs, OEPA  
Janine Secord, OEPA  
Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section



AUG 20 1990

5HR-12

Ms. Valerie Thomas  
BASF Corporation  
1720 Dana Avenue  
Cincinnati, Ohio 45207

Re: Compliance Letter  
BASF Corporation  
OHD 004 236 816

Dear Mr. Thomas:

On February 27, 1990, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal restriction regulations found in 40 CFR Part 268.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Jean Gromnicki of my staff at (312) 886-4555.

Sincerely yours,

Sally K. Swanson, Chief  
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA  
Pat Willoughby, SWDO

bcc: Sally Swanson, REB

8/17/90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	JS 8-20-90	ab for SKS 8-20-90	

5HR-12 gromnicki.walker 6-8093 diskette #4 filename: valerie.thom



**BASF Corporation**  
Coatings & Inks Division

RECEIVED  
AUG 25 1989

**BASF**

*Cincinnati*  
August 8, 1989

U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

1029-KM

OK  
Container Coatings

*Prod. Corp. Coatings & Inks*  
*OK D004 236 816*

Waste Management Division  
US EPA  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

Dear Sirs:

This demonstration and certification is pursuant to 40CFR268.8 (a) (2)(ii).

BASF Corporation, Coatings & Inks Division, Dana Avenue facility in Cincinnati, Ohio, is a generator of soft hammer restricted waste. We have made a good faith effort to locate and contract with treatment and disposal facilities practically available which provide the best treatment. The results of this demonstration effort are attached.

Based on review of those facilities listed and their capabilities, BASF has determined there is practically available treatment for the U122 formaldehyde waste; it is incineration.

BASF has determined that incineration is the best treatment practically available. This is consistent with EPA determination for BDAT and treatment standards for other first third listed wastes.

BASF intends to use TSD facilities where these best practically available treatment methods are utilized. Each offsite facility will receive a copy of this demonstration and certification with the initial waste shipment as well as a notification and certification which each subsequent shipment.

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AUG 25 1989  
OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V



I certify under penalty of law that requirements of 40CFR268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted are true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,

BASF Corporation  
Coatings & Inks Division

  
Valerie Thomas  
Environmental/Ecological Coordinator

sf





# Soft Hammer Demonstration

Formaldehyde waste 8 drums - semisolid - pumpable - U122  
All calls made 8/2/89 at 1:45

GSX/Thermal Oxidation  
Rail Road Street  
Ruebuck, S.C. 29376  
803-576-1085

Diane Prioletti  
can treat by incineration

Chemical Waste Management  
Trade Waste Incineration  
7 Moble Avenue  
Sauget, Illinois 62201  
618-271-2804

Dana Handley  
treat by incineration if  
liquid for \$680.00/drum

Cecos International  
4879 Spring Grove Avenue  
Cincinnati, Ohio 45232  
513-681-5738

Eric Kraus  
can treat by incineration

Systech Corporation  
County Road 176  
Paulding, Ohio 45879  
513-372-8077

Greg Higgins  
will not handle  
formaldehyde waste

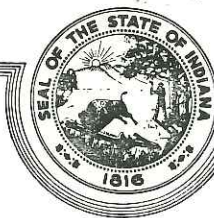
Thermal Kem  
445 S Anderson Road  
Rockhill, S.C. 29730  
803-329-9690

Belinda Wright  
Mike Seng returned call  
8/4/89 disposal by  
incineration



STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206-1964

1330 West Michigan Street  
P. O. Box 1964

RECEIVED  
APR 19 1985

HWEB

VIA CERTIFIED MAIL

STATE OF INDIANA	)		
	)	SS:	BEFORE THE ENVIRONMENTAL MANAGEMENT
COUNTY OF MARION	)		BOARD OF THE STATE OF INDIANA
IN THE MATTER OF THE ENVIRONMENTAL	)		
MANAGEMENT BOARD OF THE STATE OF	)		
INDIANA,	)		
	)		
	)	Complainant	
	)		
vs.	)		CAUSE NO. N-229
	)		
Inmont Corporation	)		
	)		
	)	Respondent	

COMPLAINT AND NOTICE OF HEARING

TO: Mr. Phillip Arvidson, Vice President  
Inmont Corporation  
1255 Broad Street  
Clifton, New Jersey 07015-6001

Mr. Thomas Terp  
Taft, Stettlinius & Hollister  
1800 First National Bank  
Center  
Cincinnati, Ohio 45202

This is a Complaint and Notice of Opportunity for Hearing under IC 13-7-11 of the Indiana Environmental Management Act and IC 4-22-1, the Indiana Administrative Adjudication Act. The Complainant is the Technical Secretary of the Indiana Environmental Management Board (Board). The Respondent is Inmont Corporation, a Company authorized to do business in Indiana, which operates a place of business at Cincinnati, Ohio.

Pursuant to IC 13-7-11 and based on an investigation by the Division of Land Pollution Control (Division), it has been determined that the Respondent is in violation of the Indiana Environmental Management Act, IC 13-7.



### Findings

This determination is based on the following Findings:

1. Respondent is a corporation in the business of manufacturing paint, varnish, and related products at a facility at 1720 Dana Avenue, Cincinnati, Ohio. *OK 0004 236 816*
2. During 1973 and 1974, off-specification paint, varnish and/or intermediate pastes and other raw materials were removed from Respondent's premises by individuals who were residents of Indiana at the time.
3. The aforesaid materials were contained in 55-gallon drums that contained, among other substances, toluene, xylene, and heavy metals, some substances having flash points below 140° F.
4. The aforesaid materials are "contaminants" as defined at IC 13-7-1-2(5), (Public Law No. 100, 1972).
5. Approximately 260 barrels of the aforesaid substances were transported in 1973 and 1974 from the Respondent's facility to Indiana by aforesaid individuals and were deposited on property located in Hancock County, Indiana.
6. The owners of the property, known as the [REDACTED] property, upon which the aforesaid substances were deposited were and are [REDACTED] Said property and is more specifically described as: *IND 985 684 583*

A part of the Southeast Quarter of Section 11, Township 16 North, Range 8 East, more particularly described as follows:

Beginning at the southwest corner of said quarter section; thence north 89 degrees 39 minutes 00 seconds east along the south line of said quarter section 1342.11 feet; thence north 00 degrees 00 minutes 00 seconds east parallel with the west line of said quarter parallel with the west line of said quarter section 148.07 feet; thence south 89 degrees 36 minutes 32 second west 1342.12 feet to a point in the west line of said quarter section; thence south 00 degrees 00 minutes 00 seconds west along said west line 147.07 feet to the Point of Beginning, containing 4.547 acres, more or less, and subject, however, to all legal highways, rights-of-way, easements and restrictions of records.

7. The deposit of the aforesaid contaminants was without provision for protection of the drums from deterioration or the containment of their contents in the event of deterioration.



8. IC 13-7-4-1(c) (Public Law No. 100, 1972) states: "No person shall deposit any contaminants upon the land in such place and manner which creates, or which would create, a pollution hazard;"
9. The deposit of the aforesaid substances created a pollution hazard.
10. Subsequent to the deposit of the aforesaid substances, remedial action was instituted by U.S. EPA resulting in the removal of the drums and ground surface contamination resulting from the escape of said substances from deteriorating drums.
11. As a result of aforesaid remedial action, expenses were incurred that are the responsibility of the Respondent and should be paid by the Respondent.
12. Additional study is needed to determine whether it is necessary to take further steps to eliminate or mitigate the pollution threat created by the disposal of the aforesaid substances.
13. The Respondent is responsible for any additional removal of contaminants and the expense incurred therefore, as well as any necessary testing and monitoring required to insure the protection of the environment.

#### Notice of Opportunity for Hearing

The Respondent is hereby notified that the Board will enter a Final Order against Respondent unless the Respondent files with the Technical Secretary of the Board, within twenty (20) days of receipt of this Complaint, a written answer to the above Findings. The written denial of any material fact contained therein or the raising of any written objection will be considered a request for a hearing.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations set out in the Findings of which you have knowledge. Said answer should contain:

- (1) A definite statement of the facts which constitute the grounds of defense; and
- (2) A concise statement of facts which you intend to place at issue in the hearing.





Notice of Opportunity for Adjustment of Claims

In the event that Respondent makes a timely request for a hearing, Respondent is requested, pursuant to IC 13-7-11-2 and IC 4-22-1-4, to attend an informal settlement conference at the Division of Land Pollution Control, 5500 West Bradbury Avenue, Indianapolis, Indiana, to confer with enforcement officials of the Board and a representative of the Attorney General concerning:

- (a) Whether the alleged violations, in fact, occurred as set forth above;
- (b) The appropriateness of any Temporary Order; or
- (c) Any proposed Civil Penalty and Proposed Final Order.

The Board encourages all parties to pursue the possibilities of settlement through the informal settlement conference prior to the hearing date. Arrangements for scheduling of the informal settlement conference times or dates should be made by contacting Mr. Verl L. Myers at AC 317/243-5045.

Dated at Indianapolis, Indiana, this 15<sup>th</sup> day of APRIL, 1985.



Ralph C. Pickard  
Technical Secretary

VLM/sk

cc: Mr. James Garrettson, Hearing Officer  
Office of the Attorney General  
Attn: Mr. Peter Niemiec  
Ms. Sally Swanson, U.S. EPA, Region V  
Mr. Rod Steele



Ohio EPA

Re: Hamilton County  
Hazardous Materials  
Inmont Corporation  
HW 05-31-0101



OHF 004 236 816

Mr. Charles Dellerman  
Inmont Corporation/United Technologies  
1720 Dana Avenue  
Cincinnati, Ohio 45207

July 26, 1983

G/TSD

STATUS 3

Dear Mr. Dellerman:

On 20 July 1983, I inspected your facility to determine your compliance with all applicable sections of the State Hazardous Waste Rules. At the time of the inspection, the following violations were noted:

OAC - Ohio Administrative Code

OAC 3745-65-16-D-2

job descriptions in  
Personnel Training Program

OAC 3745-65- 51 thru 56

Contingency Plan  
(see checklist)

Please submit these changes to this office no later than 27 September, 1983.

Don't hesitate to contact me if you have questions.

Sincerely,

David P. Duell  
Hazardous Materials Management

DPD:lmr

cc: Paula Cotter, DHMM, CO



205<sub>u</sub> P3 0930

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #11W-053-0101

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD004236816

Facility: Inmont/United Tech. Address: 1720 Dana Ave City: Cincinnati  
State: Ohio Zip Code: 45207 County: Hamilton Telephone: 513-841-6100

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Charles Delfernoy</u>	<u>Asst. Plant Manager</u>	<u>513-841-6100</u>
2.			
3.			

	INSPECTOR(S)		
1.	<u>Dave Duell</u>	<u>O EPA/EE-HWS</u>	<u>513-461-4670</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☒ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03                  |
| <input checked="" type="checkbox"/> Containers S01   | <input type="checkbox"/> Land Treatment D81               |
| <input type="checkbox"/> Tanks S02/T01   | <input type="checkbox"/> Landfills D80                    |
| <input type="checkbox"/> Surface Impoundments S04/T02  | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment  | <input type="checkbox"/> Groundwater Monitoring           |
|  | <input type="checkbox"/> Post-Closure                     |



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
2. If "yes", is it complete and accurate?	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
3. Has the facility submitted a Part B?	<u>  </u>	<u>✓</u>	<u>  </u>	<u>  </u>

## REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Facility manufactures various types of container coatings such as for aluminum and steel cans which contain consumer products.

Facility generates several waste streams including flammable solvents.

\* Facility is presently within the system for change of status from TSD to Generator.





# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

See \_\_\_\_\_  
Contingency \_\_\_\_\_  
Plan \_\_\_\_\_  
checklist. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#1 Over a long period of time, a quantity of naphthalene had accumulated around some underground storage tanks. A concrete sump with pump was installed. As the material drained it was collected and sent to WSD for incineration.

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
  - a) Internal alarm system.
  - b) Access to telephone, radio or other device for summoning emergency assistance.
  - c) Portable fire control equipment.
  - d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)
5. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))

<u>✓</u>	<u>  </u>	<u>  </u>	<u>#1</u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓			
b) In good physical condition (265.171)	✓			
c) Compatible with the wastes stored in them (265.172)	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓			
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓			
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓			

# RCRA INTERIM STATUS INSPECTION FORM

## PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#2
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#3
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#3
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	#4

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

- #2 Facility knows it is hazardous by virtue of the raw materials.
- #3 Drums do not leave the site. They are pumped out by transporter.
- #4 Job descriptions not included in Personnel Training Program



Re: Hamilton County  
Hazardous Materials  
Inmont Corporation  
OHD 004236816  
HW 05-31-0101

Mr. Hugo Rasp  
Inmont Corporation  
1720 Dana Avenue  
Cincinnati, Ohio 45207

September 16, 1982

Dear Mr. Rasp:

Due to an oversight during the inspection of your plant, not all material relating to the contingency plan was reviewed.

Your facility has since clarified the supposed problem areas and are now considered to be in substantial compliance with RCRA and the Ohio Hazardous Waste Rules.

Sincerely,

David P. Duell  
Hazardous Materials Management

DPD/dkp

cc: Kathy Homer, USEPA  
cc: Paula Cotter, OEPA







UNITED  
TECHNOLOGI  
INMONT

1720 Dana Avenue  
Cincinnati, Ohio 45207  
Tel 513 841 6100

Ken

September 13, 1982

Mr. David P. Duell  
Ohio EPA  
Hazardous Materials Management  
Seven East Forth Street  
Dayton, Ohio 45402-2086

Reference: Hamilton County  
Hazardous Materials  
Inmont Corporation  
OHD 004236816  
HW 05-31-0101

Dear Mr. Duell:

I am writing this letter to follow up on your telephone conversation with Dave Kuta on Friday, August 27, 1982. Mr. Kuta has informed me that the weaknesses you noted during your July 12, 1982, RCRA inspection of our facility regarding 40CFR, 265.51 and OAC 3745-55-51 (Contingency Planning) were discussed during the telephone conversation and have been clarified and any misunderstandings have been corrected. As discussed, on August 27, 1982, the Inmont plans did include topographical and site maps, specific hazards of waste, action plans for individuals during spills and fires, location of emergency, communication, and spill control equipment, as well as other procedures to be followed in case of an emergency.

Please call if you have any questions.

Sincerely yours,

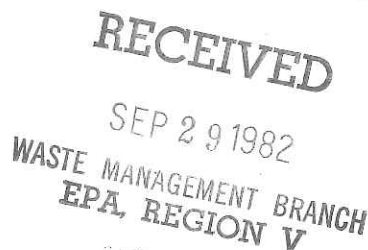
INMONT CORPORATION

  
Hugo D. Rasp  
Director of Manufacturing

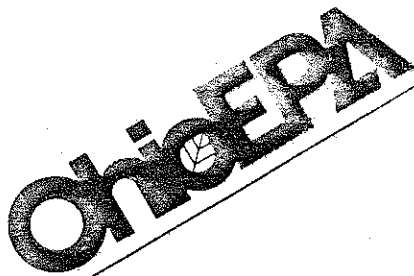
sf

cc: Kathy Homer - Ohio EPA  
361 E. Broad Street  
Box 1049  
Columbus, Ohio 43215

Bob Fragale - Ohio EPA, Columbus  
Paula Cotter - Ohio EPA, Columbus







Re: Hamilton County  
Hazardous Materials  
Inmont Corporation  
OHD 004236816  
HW 05-31-0101

Mr. C. Dellerman  
Inmont Corporation  
1720 Dana Avenue  
Cincinnati, Ohio 45207

July 19, 1982

Dear Mr. Dellerman:

On 12 July 1982, I conducted your annual Ohio Hazardous Waste Rules and Resource Conservation and Recovery Act of 1976 inspection. At the time of the inspection the following weak areas were noted:

40 CFR 265.51	Contingency plan
OAC 3745-55-51	

Please note the contingency plan checklist for areas needing to be corrected in your plan. I have also enclosed a copy of the inspection form for your review.

Please submit all corrections to this office no later than 30 September 1982.

Sincerely,

David P. Duell  
Hazardous Materials Management

DPD/dkp

Enclosure

cc: Kathy Homer, USEPA  
cc: Bob Fragale, HWFAB  
cc: Paula Cotter, OEPA



RCRA CONTINGENCY  
PLAN CHECKLIST

Facility Name Inmont Corp.  
 Address 1720 Dana Ave County Hamilton  
 City Cincinnati State Ohio Zip 45207 OEPA District SWDO  
 Primary Emergency Coordinator C. Dellerman  
 Facility Telephone 513-841-6100 Review Date 16 July 82  
 USEPA I.D. No. OH D HWFAB No. \_\_\_\_\_  
 Reviewer David P. Dwell

Plan Evaluation Key

	<u>Review</u>	<u>NA</u>	<u>Absent</u>
1. Contingency Plan Component?	_____	( )	( )
Review _____:	A mark in this column implies that the plan component asked for is present and gives the reviewer's subjective opinion as to its adequacy using the symbols A, M and U (see below).		
N/A, ( ):	Not Applicable; mark this column when the plan component asked for is not required of the facility under review.		
Absent, ( ):	Mark this column when the plan component asked for is missing.		
Acceptable <u>A</u> :	Meets the applicable regulatory requirement and is presented in a logical, functional manner. <u>Does not require correction.</u>		
Marginal <u>M</u> :	Meets the minimum regulatory requirement but lacks sufficient detail or is not presented in a logical, functional manner. <u>Requires correction.</u>		
Unacceptable <u>U</u> :	Does not meet the minimum regulatory requirement, lacks usable detail or is presented poorly. <u>Requires correction.</u>		

I. Emergency Coordinat (40 CFR 265.51(d) and 265.55,

Review N/A Absent

- |   |               |     |     |
|---|---------------|-----|-----|
| 1. The plan identifies a primary emergency coordinator and one or more alternates who are listed in the order that they will assume responsibility in an emergency.   | <u>A</u>      | ( ) | ( ) |
| 2. The title/job description of the emergency coordinator(s) show familiarity with all aspects of the wastes and waste handling processes used and is consistent with the responsibility and authority required to implement the plan in an actual emergency. | <u>A</u>      | ( ) | ( ) |
| 3. The plan contains clearly defined decision points concerning the following:  |               |     |     |
| a) the method and circumstances of initial notification of the emergency coordinator  | <u>M</u>      | ( ) | ( ) |
| b) the initial and continuing actions the emergency coordinator will take in response to the severity of the situation, such as when outside emergency services will be called for  | <u>      </u> | ( ) | (✓) |
| 4. The plan lists the following information concerning <u>all</u> persons qualified to act as emergency coordinator:  |               |     |     |
| a) name, title  | <u>A</u>      | ( ) | ( ) |
| b) phone numbers (home and business)  | <u>A</u>      | ( ) | ( ) |
| c) home addresses   | <u>a</u>      | ( ) | ( ) |
| d) effective dates  | <u>A</u>      | ( ) | ( ) |
| 5. The emergency coordinator's responsibility for reporting the incident to federal, state and local authorities (after the emergency has been controlled) is detailed in the plan and includes:  |               |     |     |
| a) name and telephone number of reporter  | <u>A</u>      | ( ) | ( ) |
| b) name and address   | <u>A</u>      | ( ) | ( ) |
| c) time and type of incident (e.g. fire)  | <u>A</u>      | ( ) | ( ) |
| d) name and quantity of materials involved  | <u>A</u>      | ( ) | ( ) |
| e) injuries   | <u>A</u>      | ( ) | ( ) |
| f) hazard to humans or environment outside the facility   | <u>A</u>      | ( ) | ( ) |
| g) name and telephone number of those to be notified  | <u>A</u>      | ( ) | ( ) |

Note: A written copy of the above report must be submitted to Region V and OEPA. Procedures or measures to prevent or mitigate further releases, fire, explosion, etc. should be described.

## II. Contingency Plan Emergency Service Agreements and Distribution of the Plan (40 CFR 265.53 and 265.52(c))

	<u>Review</u>	<u>N/A</u>	<u>Absent</u>
1. If required, copies of the contingency plan have been provided to the following:			
a) local fire department	<u>A</u>	( )	( )
b) local police department	<u>A</u>	( )	( )
c) local hospital(s)	<u>A</u>	( )	( )
d) local emergency squad	<u>A</u>	( )	( )
e) state emergency response team	<u>A</u>	( )	( )
f) other _____	<u>          </u>	( )	( )
Note: Verify that a current copy of the plan has been given to each emergency service provider by telephoning the numbers indicated in the plan.			
2. The plan documents any special arrangements, agreements or any refusal to participate, when applicable	<u>          </u>	(✓)	( )
3. The local fire department has been familiarized with the following:			
a) facility layout	<u>A</u>	( )	( )
b) properties of wastes handled	<u>A</u>	( )	( )
c) location of specific hazards	<u>A</u>	( )	( )
d) fire access roads/routes	<u>A</u>	( )	( )
e) facility evacuation plan	<u>A</u>	( )	( )
f) mutual aid agreements if more than one department may respond	<u>A</u>	( )	( )
4. The local police department has been familiarized with the following:			
a) facility layout	<u>A</u>	( )	( )
b) properties of wastes handled	<u>A</u>	( )	( )
c) location of specific hazards	<u>A</u>	( )	( )
d) facility access roads/routes	<u>A</u>	( )	( )
e) facility evacuation plan	<u>A</u>	( )	( )
f) mutual aid agreements if more than one department may respond	<u>A</u>	( )	( )
5. The local hospital has been briefed on the following:			
a) health affects of wastes handled at the facility	<u>A</u>	( )	( )
b) number of potential exposures	<u>A</u>	( )	( )
c) facility evacuation plan	<u>A</u>	( )	( )
d) decontamination procedures, if necessary	<u>A</u>	( )	( )

6. Local emergency response authorities:

- a) have reviewed potential assistance that may be provided in an actual emergency

A ( ) ( )

7. State emergency response authorities:

- a) have reviewed potential assistance that may be provided in an actual emergency  
b) have estimated response time from the nearest office response time \_\_\_\_\_

A ( ) ( )  
A ( ) ( )

III. Contingency Plan Background Information and Organization

Review N/A Absent

1. The plan includes a brief description of site activities (treatment, storage, disposal) including types of wastes handled and quantities expected to be on site

A ( ) ( )

2. The plan includes a site plan (map) showing the major structural features of the facility including topography

\_\_\_\_\_ ( ) (✓)

3. The plan includes a site plan (map) showing adjacent land features and uses including roads, streams, bodies of water, pipelines, utility installations or other objects that could be affected by an emergency situation

\_\_\_\_\_ ( ) (✓)

4. The plan identifies the specific hazards, i.e. flammable, toxic gas, associated with the various types of wastes handled at the facility

\_\_\_\_\_ ( ) (✓)

5. The plan identifies the secondary hazards associated with the wastes handled, such as generation of toxic fumes when burned, etc.

\_\_\_\_\_ ( ) (✓)

6. When applicable, the plan details all of the actions facility personnel will take in response to the following situations:

- a) fire  
b) explosion  
c) toxic fume or gas generation  
d) contact with incompatible materials  
e) major spills  
f) minor leaks (include chronic)  
g) vandalism  
h) other \_\_\_\_\_  
i) other \_\_\_\_\_

A ( ) ( )  
\_\_\_\_ ( ) ( )  
\_\_\_\_ ( ) ( )  
A ( ) ( )  
A ( ) ( )  
\_\_\_\_ ( ) ( )  
\_\_\_\_ ( ) ( )  
\_\_\_\_ ( ) ( )  
\_\_\_\_ ( ) ( )



IV. Emergency Equipment Inventory (40 CFR 265.52(e))

	<u>Review</u>	<u>N/A</u>	<u>Absent</u>
1. The emergency equipment list includes location (map, etc.), a brief physical description and an outline of capabilities	<u>          </u>	( )	( )
2. Firefighting systems:			
a) sprinkler systems	<u>          </u>	( )	( )
b) fire hydrants and hoses	<u>          </u>	( )	( )
c) on-site water storage capacity	<u>          </u>	( )	( )
d) fire extinguishers	<u>          </u>	( )	( )
e) foam generators	<u>          </u>	( )	( )
f) halon systems	<u>          </u>	( )	( )
g) sand	<u>          </u>	( )	( )
h) other <u>                                </u>	<u>          </u>	( )	( )
3. Spill Control Equipment:			
a) heavy equipment (backhoes, etc.)	<u>          </u>	( )	( )
b) absorbent materials	<u>          </u>	( )	( )
c) overpack drums	<u>          </u>	( )	( )
d) oil skimmers, slickbars, etc.	<u>          </u>	( )	( )
e) hand tools (shovels, etc.)	<u>          </u>	( )	( )
f) outside contractors	<u>          </u>	( )	( )
g) other <u>                                </u>	<u>          </u>	( )	( )
4. Communication Equipment:			
a) telephones	<u>          </u>	( )	( )
b) intercoms, P.A. systems	<u>          </u>	( )	( )
c) radio (designated emergency channel or frequency)	<u>          </u>	( )	( )
d) provisions for maintenance of these systems	<u>          </u>	( )	( )
e) other <u>                                </u>	<u>          </u>	( )	( )
5. Alarm Systems:			
a) fire alarm	<u>          </u>	( )	( )
b) plant evacuation alarm	<u>          </u>	( )	( )
c) all clear signal	<u>          </u>	( )	( )
d) leak detector on underground tanks	<u>          </u>	( )	( )
e) high level alarms on process equipment and exposed tanks	<u>          </u>	( )	( )
f) systems which activate off-site alarms or alerts	<u>          </u>	( )	( )
who is alerted? <u>                                </u>			

V. Emergency Actions and Procedures (40 CFR 265.56)

	<u>Review</u>	<u>N/A</u>	<u>Absent</u>
1. The plan describes procedures and decision points for activating the internal alarm systems	<u>      </u>	( )	(✓)
2. The plan describes procedures and decision points for contacting emergency service authorities if their assistance is required	<u>u</u>	( )	(✓)
3. The plan contains provisions for stopping operations during an emergency situation	<u>u</u>	( )	( )
4. When operations are stopped in response to fire, explosion or release, the plan provides for monitoring the following:			
a) leaks	<u>      </u>	( )	(✓)
b) pressure buildup	<u>      </u>	( )	(✓)
c) gas generation	<u>      </u>	( )	(✓)
d) ruptures in pipes, valves or other process equipment	<u>      </u>	( )	(✓)
5. The plan contains provisions for collecting and containing released wastes, contaminated soil or contaminated surface water, when applicable	<u>A</u>	( )	( )
6. The plan contains provisions for treatment, storage and disposal of recovered waste materials, when applicable	<u>M</u>	( )	( )
7. The emergency coordinator has the resources which are identified in the plan to:			
a) identify the character, exact source amount and real extent of any released materials	<u>A</u>	( )	( )
b) determine if the emergency situation presents a serious threat to human health both inside and outside of the facility	<u>A</u>	( )	( )
c) advise local authorities to evacuate adjacent areas, when necessary	<u>A</u>	( )	( )
8. The plan contains provisions for the decontamination and renovation of:			
a) all emergency equipment listed in the plan that was used in the emergency	<u>A</u>	( )	( )
b) all contaminated process equipment prior to resuming operations.	<u>A</u>	( )	( )
c) all personnel and personal protective gear involved in the emergency	<u>A</u>	( )	( )

VI. Facility Evacuation Plan (40 CFR 265.52(F))

	<u>Review</u>	<u>N/A</u>	<u>Absent</u>
1. The contingency plan contains provisions for evacuating facility personnel if required	<u>A</u>	( )	( )
2. The evacuation plan includes:			
a) a description of the signals to be used to begin the evacuation	<u>A</u>	( )	( )
b) primary evacuation routes	<u>A</u>	( )	( )
c) secondary evacuation routes	<u>A</u>	( )	( )

VII. Spill Prevention Control and Countermeasures-SPCC (40 CFR 112 and 40 CFR 265.52(b))

Note: This Section is for facilities with: (1) any one tank of over 660 gallons or (2) aggregate storage over 1,320 gallons or (3) 42,000 gallons below ground. Some of these requirements are not specifically included in RCRA Sections 264 and 265; however, please complete as much of this Section as possible since it does contain valuable information not duplicated elsewhere in the Checklist.

	<u>Yes</u>	<u>N/A</u>	<u>No</u>
1. The SPCC plan has been certified by a registered Professional Engineer	( )	( )	( )
2. The following aspects of the facility are described in the plan:			
a) primary containment system	( )	( )	( )
b) secondary containment system	( )	( )	( )
c) locations of surface drains	( )	( )	( )
d) quantity and type of above ground hydrocarbon storage gallons	( )	( )	( )
e) quantity and type of below ground hydrocarbon storage gallons	( )	( )	( )
3. The plan contains a list of available personnel who are on call to respond to emergency situations and includes home telephone numbers	( )	( )	( )
4. The plan contains a list of the emergency equipment available at the facility	( )	( )	( )
5. The plan contains a list of spill clean up contractors who may be contacted in the event of an emergency	( )	( )	( )

	<u>Yes</u>	<u>N/A</u>	<u>No</u>
6. The plan describes the following security measures:			
a) electric lighting	( )	( )	( )
b) tank and process equipment level alarms	( )	( )	( )
c) fences and gates	( )	( )	( )
d) locks	( )	( )	( )
e) guards, surveillance systems	( )	( )	( )
f) visual inspections	( )	( )	( )
g) pipe terminal connections capped	( )	( )	( )
7. The plan describes dike draining procedures and provides for:			
a) visual inspections	( )	( )	( )
b) proper valving (flapper type not permitted)	( )	( )	( )
8. The plan describes procedures for:			
a) logging drum, tank and plumbing inspections	( )	( )	( )
b) controlling spills in loading areas (dike, etc.)	( )	( )	( )
c) maintaining a written spill history	( )	( )	( )
d) designating a person to report spills to the authorities	( )	( )	( )
9. The plan contains telephone numbers for the following:			
a) National Response Center	( )	( )	( )
b) Ohio EPA Emergency Response	( )	( )	( )
c) local fire department	( )	( )	( )
d) other _____	( )	( )	( )
e) other _____	( )	( )	( )
10. The plan provides for the following types of employee training:			
a) operation of spill containment and control equipment	( )	( )	( )
b) personal protective equipment	( )	( )	( )
c) applicable laws, rules and regulations	( )	( )	( )
d) simulated incident training exercises	( )	( )	( )

## RCRA INTERIM STATUS INSPECTION FORM

## PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH0004236816

Facility: Pymont Corp. Address: 1720 Dqua Ave City: Cincinnati  
State: OHIO Zip Code: 45207 County: Hamilton Telephone: 513-841-6100  
Facility Operator: Hugo Rasp Title: Plant Mgr. Telephone: \_\_\_\_\_  
Facility Owner: United Technologies Address: \_\_\_\_\_  
City: Hartford State: Conn. Zip Code: \_\_\_\_\_ Telephone: \_\_\_\_\_  
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 05-31-0101

Date of Inspection: 12 July 82 Time of Inspection: (Start) \_\_\_\_\_ (Finish) \_\_\_\_\_

Advance Notification? ☐ No ☒ Yes: Telephone Appt.

Weather Conditions: Scorcher of a day. Partly cloudy but when old  
Sol shines through, he is blazing. Good day to be at the beach.

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. DeKerman</u>	<u>Production Mgr.</u>	_____
2.	<u>Mr. J. Lockmeyer</u>	<u>Safety Coordinator</u>	_____
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>David P. Dwell</u>	<u>HWS</u>	
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment  
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

b) Non-Listed Wastes: ☒ I ☐ C ☐ R ☐ T  
D001 D002 D003 D000  
 \_\_\_\_\_  
 \_\_\_\_\_

3. Has this facility submitted a Part A Permit Application? ☐ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark # \_\_\_\_\_ ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_

✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

\_\_\_\_\_ Yes, Complete Part 3 (Transp.)

✓ No

a) Applicable U.S. EPA I.D. Number \_\_\_\_\_

b) Ohio P.U.C.O. GR TRSF Number \_\_\_\_\_

7. A brief description of site activity:

*Facility produces several different kinds of container coatings for both the interior and exterior of cans, cartons, drums, etc.*

REMARKS, PART 1. (GENERAL INFORMATION)

# RCRA INTERIM STATUS INSPECTION FORM

## PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

5. The generator meets the following hazardous waste pre-transport requirements:

a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).

b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.

c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.

6. The generator meets the following recordkeeping and reporting requirements:

a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.

b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.

7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.

8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:

a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>✓</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	<u>✓</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	<u>✓</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u>✓</u>	_____	_____	<u>#1</u>
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>✓</u>	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	<u>✓</u>	_____	_____	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	<u>✓</u>	_____	_____	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>✓</u>	_____	_____	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>✓</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes   No   N/A   Remark #

\_\_\_\_\_

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

#1 Hazardous waste consolidation tanks are on the second floor of main production bldg.

# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	—	—	/	—
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	—	—	/	—
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	—	—	/	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	—	—	/	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	—	—	/	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	—	—	/	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	—	—	/	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	—	/	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	—	—	/	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	—	—	/	—
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	—	—	/	—
9. Does the transporter store hazardous wastes temporarily while they are in transit?	—	—	/	—
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	—	—	/	—
<p><u>NOTE:</u> TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.</p>				
10. Does the transporter import hazardous waste into the United States?	—	—	/	—
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	—	—	/	—

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

## REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention  
D: Contingency and Emergency

E: Manifest/Records/Reporting  
F: Ground Water Monitoring  
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Inspect monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Inspect security, alarm and communications devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Inspect process equipment (pipes, pumps, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Inspect containment structures (dikes, curbs, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g) Inspect hazardous waste handling/loading areas each day used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Record of any malfunctions due to equipment or operator errors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Record of any hazardous waste discharges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>city water</i>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>                          | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |                 |

## Subpart D: Contingency and Emergency

- |  |                          |                          |                          |  |
|--|--------------------------|--------------------------|--------------------------|--|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:  | <i>see attached</i>      |                          |                          |  |
| a) Actions to be taken by personnel in the event of an emergency incident.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| b) Arrangements or agreements with local or state emergency authorities.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  | <i>review</i>            |                          |                          |  |
| d) A list of all emergency equipment including location, physical description and outline of capabilities.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	—	—	—	—
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	—	—	—	—
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	—	—	—	—

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓	—	—	—
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	✓	—	—	—
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓	—	—	—
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓	—	—	—
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Records of any waste analyses and trial tests required to be performed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>  /  </u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>  /  </u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>  /  </u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>  /  </u>	_____

## Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<u>  /  </u>	_____

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	_____	_____	_____	_____
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	_____	_____	_____	_____

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	_____	_____	_____	_____
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓ _____	_____	_____	_____
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓ _____	_____	_____	_____
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓ _____	_____	_____	_____
d) A description of steps taken to decontaminate facility equipment.	✓ _____	_____	_____	_____
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	✓ _____	_____	_____	_____
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓ _____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Yes   No   N/A   Remark #

\_\_\_\_\_ ✓ \_\_\_\_\_

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

✓ \_\_\_\_\_

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

#/ Facility had a release of material that had accumulated over the years ~~in~~ in pea gravel which packs their raw material tanks. A complete investigation was made. Facility voluntarily constructed a sump well and put in drainage tiles. Any new release will be pumped into a tank and sent to an incinerator.

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes   No   N/A   Remark #

☒   ☐   ☐   \_\_\_\_\_

## Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

\_\_\_\_\_   ☐   ☒   \_\_\_\_\_

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

- 1) III (B)(2) The company agreed to prepare a written plan for the detailed analysis and have it on file.
- 2) IV(E) Containers are stored so that there is inadequate access. The company agreed to address this point.
- 3) V(B) The fire dept. (by monthly inspections) is aware of their emergency plan, but has not been supplied with a "hard" copy to date. Will be done, however.
- 4) VI(C)(2)(g) Will be supplied to company by  
VII Corporate offices.

NOTE 1) & 3) are not deemed to be critical & Company has agreed to correct. 2) is more critical & again company has agreed to correct. The company had no idea when 4) would be fulfilled. Written confirmation

X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

N/A

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

# RCRA Inspection Report

RECEIVED

JUL 22 1987

WASTE MANAGEMENT BRANCH  
EPA REGION V

EPA Identification Number OHD 004236816

HWFAB Permit Number (if appropriate) 05-31-0101

Facility Name Inmont Corp.

Location 1720 DANA Ave

Cincinnati, Ohio 45207

Person(s) Interviewed

Title

Telephone

C. Defferman

Assist. P.H. Mgr.

513-841-6100

J. Lockmeyer

Safety Coord.

513-841-6100

Inspector(s)

Agency/Title

Telephone

Dave Duell

Ohio EPA /HWS

513-461-4670

Ohio EPA

Ohio EPA

## Installation Activity

Mark One

If the site is a TSDF, check the boxes indicating which forms were used -

☒ Generator only (G)

☐ Transporter only (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ Waste Piles S03

☐ Land Treatment D81

☐ Landfills D80

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting

☐ Groundwater Monitoring

☒ Closure and Post-Closure

☐ Financial Requirements

☒ Containers S01

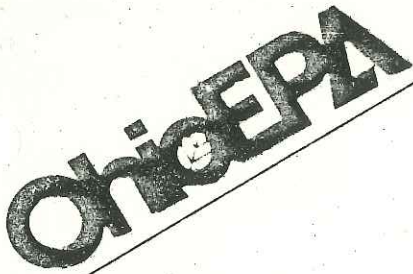
☒ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment T03

☐ Chemical/Physical/Biological T04





Re: Application Number 81-HW-0101  
Hamilton County

August 24, 1981

Hugo Rasp, Plant Manager  
Inmont Corporation  
1720 Dana Avenue  
Cincinnati, Ohio 45207

Dear Mr. Rasp:

On June 30, 1981, James Liggett of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Hugo Rasp.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/bsr

cc: ✓ Kathleen Homer, U.S. EPA, Region V  
James Liggett, SWDO

CERTIFIED MAIL





DEFICIENCY NOTIFICATION TABLE  
ISS INSPECTION

FACILITY NO. - 81-HW-0101  
OWNER - INMONT CORP.  
FACILITY NAME - INMONT CORP.  
FACILITY LOCATION - 1720 DANA AVE - CINCINNATI  
FACILITY CONTACT - HUGO KASP, PLNT. MANAGER  
ISS INSPECTION DATE - 6/30/81

PHONE NO. - (513) 841-6100

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13	B.	✓	
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
6	V A 1	3745-55-52	265.52	B	✓	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53	B	✓	
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"	B	✓	
9	VII A 1	3745-56-03	265.112	B	✓	
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B	✓	
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265.192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265.193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
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		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
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			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
			3745-57-84	265.314		
			2	"	"	
	G	1	3745-57-85	265.315		
			3745-57-85	265.315		
			3745-58-33	265.373		
			2	"	"	
	I	B	3	"	"	
			4	"	"	
			5	"	"	
			5	"	"	
16	II	A	1a	3745-58-35	265.375	
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			c	"	"	
	17		2a	3745-58-35	265.375	
			b	"	"	
			1	"	"	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-30	262.30			
	2 (A)	3745-52-31	262.31			
	(B)	3745-52-33	262.33			
	(C)	3745-52-34	262.34			
21	3 1	"	"			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COL' V IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.



STATE IDENTIFICATION NUMBER

87-HW-0101

EPA IDENTIFICATION NUMBER

0HD004236816

TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: INMONT CORPORATION
- (B) Street: 1720 DANA AVE.
- (C) City: CINCINNATI (D) State: OHIO (E) Zip Code: 45207
- (F) Phone: (513) 841-6100 (G) County: HAMILTON
- (H) Operator: SAME AS ABOVE
- (I) Street: \_\_\_\_\_
- (J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_
- (M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_
- (O) Owner: SAME AS ABOVE
- (P) Street: \_\_\_\_\_
- (Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_
- (T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_
- (V) Date of Inspection: 6/30/81 (W) Time of Inspection (From) 12:35p (To) 3:00p
- (X) Weather Conditions: PARTLY Cloudy Warm, Humid 90°F

(Y) Person(s) Interviewed	Title	Telephone
<u>Hugo Rasp</u>	<u>Plt. MGR</u>	<u>841-6100</u>
<u>Chuck Dellerman</u>	<u>Prod. MGR</u>	<u>841-6100</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>JAMES LIGGETT</u>	<u>SWDO</u>	<u>461-4670</u>
<u>DON MARSHALL</u>	<u>SWDO</u>	<u>461-4670</u>
(AA) Preparer Information		
Name <u>Jim Liggett</u>	Agency/Title	Telephone

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> A. Storage and/or Treatment | <input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)  |
| 1. Containers (I)   |  |
| 2. Tanks (J)  |  |
| 3. Surface Impoundments (K)                                     | <input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q) |
| 4. Waste Piles (L)  |  |
| <input type="checkbox"/> B. Land Treatment (M)                  |  |
| <input type="checkbox"/> C. Landfills (N)                       |  |

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.



III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	<u>X</u>	—	_____
2. Facility expansion?	—	<u>X</u>	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	<u>X</u>	—	<u>Need written plan</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	<u>N/A</u>	—	<u>Plt MGR now reviews all waste - would see waste change.</u> <del>_____</del>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	—	—	_____
2. Artificial or natural barrier around facility?	<u>X</u>	—	—	_____
3. Controlled entry?	<u>X</u>	—	—	_____
4. Danger sign(s) at entrance?	<u>X</u>	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>X</u>	—	—	<u>NONE has occurred</u>
2. Records of operator error?	<u>X</u>	—	—	<u>"</u>
3. Records of discharges?	<u>X</u>	—	—	<u>"</u>

### III. GENERAL FACILITY STANDARDS - C. inued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	-----
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	-----
 (E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	-----
2. Job descriptions?	<u>X</u>	---	---	<u>in the title</u>
3. Description of training?	<u>X</u>	---	---	<u>by listings (the title describes the training)</u>
4. Records of training?	<u>X</u>	---	---	-----
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	-----
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	-----
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	{ <u>almost total area of plant storage is special handling</u>
2. No smoking signs?	<u>X</u>	---	---	
3. Separation and protection from ignition sources?	<u>X</u>	---	---	

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI\* Remarks

— X —

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X — —

2. Telephone or 2-way radios at the scene of operations?

X — —

telephone

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — —

no decontamination today

Indicate the volume of water and/or foam available for fire control:

Main supply 8" line 175#  
Approx. 1000 #, city has "light" water

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X — —

2. Is emergency equipment maintained in operable conditions?

X — —

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X — —

(E) Is there adequate aisle space for unobstructed movement?

X

Need to improve aisle space set up

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

X

X

X

X

\*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>  </u>	<u>X</u>	<u>  </u>	<u>will be supplied to F.D.</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<u>  </u>	<u>N/A</u>	<u>  </u>	<u>  </u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING  
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
2. Are records of past shipments retained for 3 years?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>X</u>	<u>  </u>	<u>  </u>	<u>no problems to date</u>

VI. RECORDKEEPING - Continu

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X

c. The location and quantity of each hazardous waste within the facility?

X

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

f. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A

g. All closure and post closure costs as applicable? (Effective 5-19-81)

(NI)

will be supplied by corporate Hdqtr.

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>			
2. Has this plan been submitted to the Regional Administrator	<u>X</u>			
3. Has closure begun?	<u>X</u>			
4. Is closure estimate available by May 19, 1981?	<u>X</u>			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			<u>N/A</u>	

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>			
2. Are containers compatible with waste in them?	<u>X</u>			
3. Are containers stored closed?	<u>X</u>			<u>with few exception.*</u>
4. Are containers managed to prevent leaks?	<u>X</u>			
5. Are containers inspected weekly for leaks and defects?	<u>X</u>			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>X</u>			<u>has railrd. * right of way thru plant</u>

\* workers were handling containers at time of inspection

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>X</u>	---	---	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	---	---	<u>by distance</u>

Is this Applicable?

J  
TANKS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	<u>X</u>	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<u>N/A</u>	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	<u>N/A</u>	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	<u>N/A</u>	---	---	-----
5. Are required daily and weekly inspections done?	<u>X</u>	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? <u>Indicate if waste is ignitable or reactive.</u> (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>X</u>	---	---	<u>NONE are rendered</u>
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>N/A</u>	---	---	<u>NON-REAC. or NON-IGN.</u>



Yes No NI\* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet **OK**

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

<sup>K</sup>  
SURFACE IMPOUNDMENTS

**N/A**

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?  | _____ | _____ | _____ | _____ |
| 2. Do earthen dikes have protective covers?  | _____ | _____ | _____ | _____ |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?  | _____ | _____ | _____ | _____ |
| 4. Is the freeboard level inspected at least daily?  | _____ | _____ | _____ | _____ |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration?  | _____ | _____ | _____ | _____ |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | _____ | _____ | _____ | _____ |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)   | _____ | _____ | _____ | _____ |

L  
WASTE PILES

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

\*Not Inspected

M  
LAND TREATMENT N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?

-----

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

-----

3. Is waste analyzed according to 265.273?

-----

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

-----

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

-----

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

-----

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

-----

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

-----

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

-----

N  
LANDFILLS

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

Yes No NI\* Remarks

(A) General Operating Requirements  
Does the facility provide the following:

\*\*1. Diversion of run-on away from active portions of the fill? \_\_\_\_\_

\*\*2. Collection of run-off from active portions of the fill? \_\_\_\_\_

\*\*3. Is collected run off treated? \_\_\_\_\_

4. Control of wind dispersal of hazardous waste? \_\_\_\_\_

(\*\*Effective 11-19-81)

(B) Surveying and Recordkeeping  
Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? \_\_\_\_\_

2. The contents of each cell and the location of each hazardous waste type within each cell? \_\_\_\_\_

(C) Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81? \_\_\_\_\_

2. Has this plan been submitted to the Regional Administrator? \_\_\_\_\_

3. Has closure begun? \_\_\_\_\_

4. Is closure cost estimate available by 5-19-81? \_\_\_\_\_

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? \_\_\_\_\_

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P N/A  
INCINERATION and THERMAL TREATMENT

(A) Facility Name: \_\_\_\_\_

(B) Date of Inspection: \_\_\_\_\_

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

B. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

\*Not Inspected

Yes No NI\* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

\_\_\_\_\_

b. Mercury?

\_\_\_\_\_

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

4. \_\_\_\_\_

5. \_\_\_\_\_

### III. Monitoring and Inspections

Yes No NI\* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

\_\_\_\_\_

B. Is steady state maintained or corrections attempted?

\_\_\_\_\_

C. Is stack plume observed at least hourly for normal color and opacity?

\_\_\_\_\_

D. Did any stack observations made by owner or operator show a plume different than normal?\*\*

\_\_\_\_\_

E. If yes to D above, were corrections made to return emissions to normal appearance?\*\*

\_\_\_\_\_

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

\_\_\_\_\_

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

\_\_\_\_\_

\* Inspected

\*\* Specify in Remarks for what period of time this was checked.

#### IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	



	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>X</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	<u>N/A</u>	—	—	_____

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	—	—	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

*N/A*

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	_____	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	_____

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

*N/A*

Has the installation imported or exported Hazardous Waste?	_____	_____	_____	_____
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(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
c. Met the Manifest requirements?	_____	_____	_____	_____
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	_____	_____	_____	_____